

## REMARKS

### A. Allowable Claims

Claim 80 was objected to as being dependent upon a rejected base claim. The Office Action indicated that claim 80 would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. Claim 80 has been amended accordingly and therefore is in condition for allowance. Claims 77-78, 82-87, and 89-95, as amended, are allowable for at least the reason that they depend directly or indirectly from claim 80. Applicants respectfully request that claims 77-78, 80, 82-87, and 89-95 be allowed.

### B. Response to Objection to the Specification

The specification was objected to as allegedly failing to provide proper antecedent basis for the term "normal playback mode" as used in claims 84, 103, 107, and 113. Applicants have deleted the term "normal playback mode" from claims 84, 103, 107, and 113 and respectfully request that the objection be withdrawn.

### C. Response to Claim Objections

Claim 111 stands objected to because the recitation of "the second image" lacks antecedent basis. Applicants have amended claim 110 to provide antecedent basis for the recitation of "the second image" in claim 111. Applicants respectfully request that the objection be withdrawn.

### D. Response to Claim Rejections under 35 USC § 103

Claims 76-79, 81-101, and 110-115 stand rejected under 35 USC § 103(a) as being unpatentable over *Dunn et al.* (US Patent No. 5,861,906) in view of *Wang* (US Patent No. 6,501,902). Claims 102-109 stand rejected under 35 USC § 103(a) as being unpatentable over *Budow et al.* (US Patent No. 5,625,864) in view of *Swenson et al.* (US Patent No. 6,064,380).

In order for a claim to be properly rejected under 35 U.S.C. §103, the teachings of the prior art reference must suggest all features of the claimed invention to one of ordinary skill in the art. *See, e.g., In re Dow Chemical*, 837 F.2d 469, 5 U.S.P.Q.2d 1529, 1531 (Fed. Cir. 1988); *In re Keller*, 642 F.2d 413, 208 U.S.P.Q. 871, 881 (C.C.P.A. 1981).

Claims 76, 79, 81, and 88 have been canceled without prejudice, waiver, or disclaimer. Therefore, rejections and objections of these claims are rendered moot. Applicants are not expressly addressing the validity of assertions made by the Examiner regarding claims 76, 79, 81, and 88 since the validity of such assertions may not be relevant to the allowance of the currently pending claims. Therefore, Applicants should not be presumed to agree with any statements made by the Examiner regarding claims 76, 79, 81, and 88 unless otherwise specifically indicated by Applicants.

Claim 80, as amended, is in condition for allowance because claim 80 at least recites: “said user input configured to assign a character sequence is received while said video presentation is being presented to said user.” (Page 21, paragraph 10, Office Action, Paper No. 8). Applicants have amended claims 77-78, 82-87, and 89-95 to depend directly or indirectly from claim 80. Applicants respectfully request that claims 77-78, 82-87, and 89-95 be allowed and the rejection be withdrawn.

Claim 96 has been amended to include “store data corresponding to said character sequence in the memory responsive to receiving user input configured to assign a character sequence while said motion video presentation is being presented to said user”. Claim 102 has been amended to include “providing a plurality of names corresponding to the plurality of images, wherein each of the plurality of names was selected by a respective user input received by the STT while the motion video presentation was being output by the STT, wherein each of the plurality of names comprises a character sequence.” Claim 106 has been amended to include “each of the plurality of names was selected by a respective user input received by the STT while the motion video presentation was being output by the STT, and wherein each of the plurality of names comprises a character sequence.” Claim 110 has been amended to include “associating by the STT a plurality of respective names with the plurality of locations responsive to a plurality of respective user inputs received by the STT while the motion video presentation was being output by the STT, wherein each of the plurality of respective names comprises a character sequence”. Claim 112 has been amended to include “associating a plurality of respective names with the plurality of locations responsive to a plurality of respective user inputs received by the STT while the motion video presentation was being output by the STT, wherein each of the plurality

of respective names comprises a character sequence”. Claim 115 has been amended to include “said user input configured to assign a character sequence is received by the STT while said motion video presentation is being output by the STT”.

As mentioned with reference to claim 80, Applicants respectfully submit that claims 96, 102, 106, 110, 112, and 115 contain allowable subject matter similar to the allowable elements/limitations of claim 80. Consequently, Applicants respectfully request that claims 96, 102, 106, 110, 112, and 115 be allowed and the rejection be withdrawn. If independent claims 96, 102, 106, 110, 112, and 115 are allowable over the prior art of record, then its dependent claims 97-101, 103-105, 107-109, 111, and 113-114 are allowable as a matter of law, because these dependent claims contain all features/elements/steps of their respective independent claims 96, 102, 106, 110, 112, and 115. *In re Fine*, 837 F.2d 1071 (Fed. Cir. 1988).

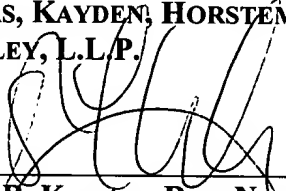
E. New Claims

Claims 116-119 have been newly added. Applicants believe that claims 116-119 are adequately supported by the specification. Furthermore Applicants respectfully submit that claim 116 is allowable for at least the reason that none of the cited references teach, suggest, or disclose “receiving by the STT a first user input, said first user input being configured to assign a character sequence to a visual scene in a motion video presentation, said user input being received by the STT while the STT is outputting said motion video presentation”. If independent claim 116 is allowable over the prior art of record, then its dependent claims 117-119 are allowable as a matter of law, because these dependent claims contain all features/elements/steps of their respective independent claim 116. *In re Fine*, supra.

### **CONCLUSION**

Applicants respectfully maintain that the currently pending claims 77-78, 80, 82-87, and 89-119 are in condition for allowance. Should the Examiner have any comments or suggestions that would place the subject patent application in better condition for allowance, he is respectfully requested to telephone the undersigned attorney at (770) 933-9500.

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